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To: richard.karney@ee.doe.gov
Sent: 03/27/2003 02:44 PM

Subject: letter to DOEenergy star.doc

Richard H. Karney, P.E., Manager
March 27, 2003
Energy Star Program
Building Technologies Program

Dear Mr. Karney,

I have listened to you speak and chatted briefly with you at AAMA meetings, however I still remain confused about the DOE's Energy Star Program. It appears to me that energy savings, life safety/code concerns would not be well served by these proposed standards. The conclusions proposed are based on assumptions that do not consider real world conditions (environmental factors and window use) but are based on the theoretical properties of glass units and window framing materials. There are many dynamic factors (real world) that affect how a window will perform over a reasonable period of time (15 to 25 years) such as:

- * The windows' use (opening and closing)
- * The affects of wind, rain, temperature and sun on the performance of a window and it's components
- * The weather stripping used to seal the operating portion of the window to it's frame
- * The manner in which the window is installed.

My understanding of the DOE's Energy Star Standards indicates none of these factors have been considered. My real world observations indicate that any one of these factors can affect energy usage more than your proposed rating system based on u-factors and SHGC.

The proposed standard would push our nation to greater energy usage and other potentially serious problems such as:

- * The problematic environmental impact of vinyl (PCV)
- * Additional cost to the consumer resulting from the lack of durability and suitability of framing materials (replacement costs)
- * Higher operating cost/energy usage (the weather tightness of vinyl and wood windows when compared to aluminum)
- * The negative impact on the U.S. economy by forcing many aluminum window manufacturers and their related businesses that they support and that support them out of business.

In conclusion these standards must be more realistic and not be a constraint on commerce or unfairly favor one material over another. We live in a real world

where the wind blows, rain and snow fall, the sun shines, temperatures fluctuate, people use and misuse windows. All these issues must be considered and factored into the DOE/Energy Star Standards, otherwise the "Standards" will not be relevant or beneficial and will certainly not save energy.

Gantt W. Miller, AIA
Chairman of the Board
Winco Window Company